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Attorneys for Defendants
9 AMERICA'S WHOLESALE LENDER; DEUTSCHE BANK
NATIONAL TRUST COMPANY, as Trustee for the Harborview
10 Mortgage Loan Trust 2006-5; and BANK OF AMERICA, N.A.,
successor by merger to BAC Home Loans Servicing, LP
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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
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16 ATTILIO ARMENI, individual,
17 Plaintiff,

18 vs.

19 AMERICA'S WHOLESALE LENDER;
20 DEUTSCHE BANK NATIONAL
TRUST COMPANY, AS TRUSTEE
FOR THE HARBORVIEW
21 MORTGAGE LOAN TRUST 2006-5;
22 AND BANK OF AMERICA, AS
SUCCESSOR BY MERGER TO BAC
HOME LOANS SERVICING, LP;
23 Does 1 – 10, inclusive,

24 Defendants.
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Case No.: 8:11-CV-01317 DOC (SHx)
Hon. David O. Carter
Ctrm. 9-D

**DEFENDANTS' INITIAL
DISCLOSURES PURSUANT TO
FEDERAL RULES OF CIVIL
PROCEDURE 26(a)(1)**

Complaint Filed: August 31, 2011
Third Amended Complaint Filed:
February 15, 2012

1 Pursuant to Federal Rules of Civil Procedure, Rule 26, Defendants,
2 AMERICA'S WHOLESALE LENDER, DEUTSCHE BANK NATIONAL
3 TRUST COMPANY, as Trustee for the Harborview Mortgage Loan Trust 2006-5
4 ("Deutsche Bank"), and BANK OF AMERICA, N.A., successor by merger to BAC
5 Home Loans Servicing, LP, provide the following initial disclosures:

6 **A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE**
7 **INFORMATION**

8 Deutsche Bank identifies the following individuals likely to have
9 discoverable information that it may use to support its claims or defenses and the
10 subjects of the information:

11 1. Custodian of records of Bank of America, N.A., the servicer of
12 Plaintiff's loan on behalf of Deutsche Bank, has knowledge regarding Plaintiff's
13 payment history, collection activity and monthly charges in connection with
14 Plaintiff's loan and can be contacted through Severson & Werson.

15 2. Custodian of records of Deutsche Bank has knowledge regarding the
16 assignment of the interest in Plaintiff's loan and can be contacted through
17 Severson & Werson.

18 **B. DOCUMENTS SUPPORTING DEUTSCHE BANK'S CLAIMS**
19 **AND DEFENSES**

20 Defendants are in the process of locating pertinent documents which it will
21 use to support its claims and defenses and will make a production of those
22 documents.

23 **C. COMPUTATION OF EACH CATEGORY OF DAMAGES**

24 Defendants make no claim for damages in this action.

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1 **D. INSURANCE**

2 Defendants are unaware of any insurance policy that could satisfy any
3 judgment that could be entered in this action.

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5 DATED: March 20, 2012

SEVERSON & WERSON
A Professional Corporation

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8 By: Wendy L.R. Miele
Wendy L.R. Miele

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10 Attorneys for Defendants
11 AMERICA'S WHOLESALE LENDER;
12 DEUTSCHE BANK NATIONAL TRUST
13 COMPANY, as Trustee for the Harborview
14 Mortgage Loan Trust 2006-5; and BANK
15 OF AMERICA, N.A., successor by merger
16 to BAC Home Loans Servicing, LP
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